

AMENDMENTS TO THE CLAIMS:

This listing of claims will replace all prior versions and listings of claims in the application:

1-4. (Cancelled)

5. (Currently Amended) A method for manufacturing a flash EEPROM cell, comprising the steps of:

forming a tunnel oxide layer over a silicon substrate;

forming a floating gate by depositing a polysilicon layer over the tunnel oxide layer;

forming a first dielectric layer over the floating gate;

forming a first control gate by depositing a polysilicon layer partially over the first dielectric layer, thereby exposing at least a portion of the first dielectric layer;

forming a second dielectric layer covering the first control gate and the exposed portion of the first dielectric layer;

forming a second control gate by depositing a polysilicon layer over the second dielectric layer; and

forming a source and a drain in the silicon substrate ~~by ion implantation with a self-aligned etching technique, wherein an edge of the first control gate is substantially aligned with an edge of the floating gate and an edge of the source.~~

6. (Currently Amended) The method as recited in claim 5, wherein [[one]] a sidewall of the first control gate ~~at least partially overlaps~~ is substantially aligned with a respective sidewall of the second control gate.